

UTAH WIC PROGRAM

TRAINING MODULE FOR CASHIERS



State of Utah
Department of Health
Division of Family Health & Preparedness
WIC Program
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Overview

The Cashier's Training Module has been developed in accordance with the Federal Register 7 CFR 246.12 for compliance with the **Annual** vendor training requirements: This module will cover the following areas:

- 1) The purpose of the WIC Program;
- 2) Allowable WIC foods authorized by the State agency;
- 3) WIC procedures for transacting checks;
- 4) Vendor complaint process;
- 5) Any changes to program requirements since the last training.

Training Credit

- Approximate working time is 30 minutes: 20 minutes reading time and 10 minutes exercise test and application of knowledge.
- > Training Credit: Completion of the Cashier Training Manual and the evaluation test will satisfy the Annual Cashier Training requirement.
- Although the Cashier Training Manual is designed with the Cashier in mind, other managers and supervisors may complete this training in addition to the Vendor Training Manual.
- Bookkeeping staff may benefit from completing the Cashier Training Manual in addition to the Bookkeeping Staff Training Manual.
- ➤ In order for your store to receive training credit for this module, the comprehensive **Test Evaluation** must be completed and forwarded to the State WIC Office within ninety (90) days.

THE PURPOSE OF THE WIC PROGRAM

The Women, Infants and Children Program (WIC)

- WIC is a special supplemental food program for pregnant, postpartum, and breastfeeding women, infants, and children up to five years of age who live in an area served by a local WIC agency, meet income criteria, and who are determined by qualified health professionals to be at nutritional risk. In order to prevent the occurrence of health problems, WIC program participants are provided with foods high in iron, protein, calcium, and vitamins A, C and D. In addition to receiving food supplements, participants in the WIC program receive nutrition education, and when appropriate, referral to other health and social service programs.
- WIC has shown to lower medical costs for infants in the first 60 days of life.
- The WIC program is funded at the national level by the United States Department of Agriculture. The WIC program in Utah is administered by the Utah Department of Health, Division of Family Health and Preparedness.

THE RETAIL SYSTEM

 The Utah WIC Program operates within the retail grocery system. Authorized grocery retailers redeem all WIC checks issued by the local WIC agencies within the State of Utah.

The Retailer's Role

- The State Agency contracts with local county health departments to operate the Utah WIC program, providing the WIC program participants with specific food products issued at the local level.
- The WIC program in Utah operates on a check issuance system. The WIC participant
 exchanges the WIC check issued by the local WIC agency for the appropriate authorized WIC
 food items(s) in the quantities and sizes specified on the check. The retailer's role in the
 program is to provide only those WIC foods indicated on the check in the quantities specified.
- The Utah WIC program is a major purchaser in the retail grocery system. In Federal Fiscal Year 2012 over \$38 million of food was purchased with Utah WIC checks.

AUTHORIZED WIC FOODS

The State of Utah WIC Program publishes an authorized food booklet that includes only foods that are approved by United States Department of Agriculture (USDA). All cashiers are required to become familiar with the current Utah WIC Authorized Food Booklet. Please take a few minutes to read through the booklet to learn which foods are approved and what items should not be purchased. Ask your manager or contact the State WIC Office if you have any questions about WIC approved foods.

Store Brand/Private Labels

A store brand/private label is defined as a brand owned not by a manufacturer or producer; but by a retailer or supplier who gets its goods made by a contract manufacturer under its own label. The policy of requiring the WIC client to purchase the store brand/private labels of Utah authorized WIC foods is utilized to maximize food dollars in order to serve our WIC population. In order for our WIC clients and vendors to better understand the concept of store brand/private labels, please review the following guidelines.

Guidelines

A store brand (also called a private label) MUST be purchased when indicated in the Authorized WIC Foods booklet. Some examples of store brands/private labels include: Western Family, Kroger, Albertsons/Essential Everyday, Great Value, Market Pantry, Hy-Top, (Malt-O-Meal cereals are authorized under this definition); other store brands/private labels may be available. If a store carries more than one store brand/private label then either product may be purchased regardless of price. If the store does not carry a store brand/private label for the WIC food item, then the cheapest brand name food item (such as Skippy, Kraft, Meadow Gold, etc.) can be purchased.

For cold cereal, full strength juice and frozen juice only, the WIC client MUST purchase an authorized store brand or private label (Western Family, Kroger, Albertsons/Essential Everyday, Great Value, Market Pantry, Hy-Top, (Malt-O-Meal cereals are authorized under this definition) and cannot substitute a brand name (Kellogg's, General Mills, Post, Quaker Oats, Juicy Juice, Welch's, etc.). If a retailer is determined by the State WIC Office that they cannot obtain a store brand or private label cereal or juice, then a separate card will be given to the WIC participant indicating what can be purchased at those retailers.

POLICIES & PROCEDURES

All cashiers or checkers accepting WIC checks should be trained on these policies and procedures.

- For WIC approved cold cereals and juices, the WIC customer must purchase a store brand/private label. Substitutions of national brand name cold cereals or juices will not be permitted.
- There may not be exact equivalent types of cold cereal in store brand/private label compared to the national brands. For example, the retailer may be able to obtain several different store brand/private label cold cereals and juices, but the customer wants a specific national brand name or type of cereal that may not have a similar equivalent in the store brand/private label. The WIC customer *must* choose from the store brand/private label variety that is available on the shelf at the store.
- In accordance to the definition of "Store Brand/Private Label," if a manufacturer's national brand name is on-sale for less than or equal to the Store Brand/Private Label," the national brand cannot be purchased. If a Store Brand/Private Label is temporarily out of stock, the WIC customer cannot substitute a manufacturer's national brand name item.

- If a food item is specifically listed by brand name on the authorized food booklet or on the check, that specific item must be purchased and a store brand/private label brand CANNOT be substituted.
- If there is an exception for a WIC client to purchase a store brand/private label product on WIC, the WIC client must present a special food letter printed on State Agency or County letterhead stating what specific food item(s) can be purchased in lieu of the store brand/private label policy.
- The vendor may provide only the authorized supplemental foods listed on the check. The vendor may not provide unauthorized food items, nonfood items, cash, or credit (including rain checks) in exchange for WIC checks.
- The vendor may not provide refunds or permit exchanges for authorized supplemental foods
 obtained with checks, except for exchanges of an identical authorized supplemental food item
 when the original authorized food item is defective, spoiled, or out of date. An identical
 authorized food item means the exact brand and size as the original authorized supplemental
 food item.
- Each retailer must stock a variety of WIC food items in the quantities and sizes specified in the Vendor Agreement. Stores must acquire additional quantities or brands of infant formula in order to redeem checks within 72 hours of notification of need. Refer to the Food Inventory Requirements listed in the Vendor Training Manual or in the Vendor Agreement to determine the minimum inventory levels for your peer group.

WIC CHECKS

Health professionals at the WIC clinic designate which WIC foods and the quantities of those foods the WIC participant(s) are allowed to receive. There are two kinds of WIC checks: 1) Regular WIC checks list specific food items, including the quantity and the description; and 2) a cash-value voucher check is used specifically for fresh fruits and vegetables. The latter has a maximum dollar value printed on the check.

The WIC Check



- When the check is presented for transaction, the clerk must verify the selected items against those foods prescribed on the check. No substitutions are allowable except when accompanied by a 'Special Food Letter'.
- Remember the WIC client does NOT have to purchase all of the foods listed on the check.
- Participants can purchase their WIC food from any Utah WIC authorized vendor.
- Do not accept any WIC checks from other states.
- The WIC participant cannot utilize "self-checkout" lanes as a store associate must verify the correct foods, quantity of the foods, place the total amount on the front and compare the signatures.

The steps for processing the WIC check are:

- 1) Ask to see the WIC ID Packet.
- 2) Examine the check for alterations.
- DO NOT accept a check that has been altered in any way. WIC checks have a microprint border and a watermark. Absences of these indicate the document is a copy.
 - o Ensure none of the numbers or descriptions have been changed
 - Check to make sure the dates to use have not been changed
- 3) Examine "First Date to Use" and the "Last Date to Use" boxes.
- The WIC check is valid from the "First Date to Use" through the "Last Date to Use." DO NOT accept any WIC checks prior to the "First Date to Use" or later than the "Last Date to Use." Remember that the time frame between the dates may not always be thirty (30) days.
- 4) Verify the selected items.
- Using the check like a checklist, ring up ONLY those prescribed foods on the check in the quantities selected. The amounts listed are maximums. (Remember, the WIC client does not have to purchase all of the food items. The WIC client can purchase less than the quantity specified. No substitutions are allowed unless accompanied by a Special Food/Formula Letter on State Agency or Local Agency letterhead. Refer to the Authorized Food Booklet for additional WIC food information.
- NO sales tax can be charged on Utah WIC food items.
- If the store does not have all the food items listed on the check, the vendor should NOT accept the WIC check. Offer the participant the option of returning at a later time or shopping at another WIC store. NO "rain checks" are allowed with WIC checks.
- 5) Enter the total amount for that check in the "Pay Exactly" box.
- Using only black ink, write in the numerical total of all items purchased on that specific check in the "Pay Exactly" box. DO NOT place a "\$" or a "¢" in front or in back of the numerical value. Ensure the numbers you write are legible. It is recommended that block numbers are used.
- Each check is treated as a separate transaction. After writing the amount of the check, present the check to the endorser for signature. Each check should be signed separately and in the presence of the cashier.
- 6) The Utah WIC ID Packet is used to verify the signature of the endorser or proxy. DO NOT ACCEPT any check without a Utah WIC ID Packet. No photocopies are accepted.

- The cashier CANNOT ask to see any other form of identification, such as a Driver's License, to redeem WIC checks. If the client did not bring the Utah WIC ID Packet, then the cashier must politely refuse the transaction.
- 7) Witness the Authorized Signature
- Witness the endorser's or proxy's AUTHORIZED signature on the WIC check, comparing it to any of the signatures on the WIC ID Packet. The signature on the check must match one of the authorized signatures on the WIC ID Packet. DO NOT accept any WIC checks where the signatures do not match or the WIC participant fails to place the authorized signature on the check.

The WIC Cash-Value Voucher Check with a Maximum Dollar Amount



- The second type of WIC check is used to purchase fresh fruits and vegetables. Each check has a fixed maximum amount printed on the front: \$6.00, \$10.00 or \$15.00. If the total cost of the fruit and vegetables selected is more than the maximum amount stated on the front, the participant CANNOT pay the difference.
- DO NOT give cash back to the WIC customer if the total is less than the maximum amount.
- DO NOT place a "\$" or a "¢" in front of the price. Place the total purchase price on the check PRIOR to obtaining the authorized signature. The participant cannot sign before or after all WIC transactions have been completed. Each check transaction is completed separately. (Do not combine any checks).
- Like a regular WIC check, the CVV check is valid within the First Date to Use and the Last Date to Use (Remember that these dates may not always be thirty (30) days apart, they may be less.)
- The store cashier MUST write the total purchase price of the actual transaction amount (the
 actual cost of the fruits and vegetables) using a <u>black ink</u> pen only. (DO NOT use a blue or
 other colored pen).

Finish processing the transaction using the same method you would for a regular WIC check.

REASONS CHECKS ARE REJECTED BY THE BANK

The check will be rejected if any of the following criteria is detected by the bank:

- Checks redeemed prior to the first date to use.
- Checks redeemed after the last date to use.
- Checks missing the total amount in the 'Pay Exactly' box
- Total amount written in the 'Pay Exactly' box is unreadable
- Checks missing the authorized signature
- · Checks that have been altered
- If unauthorized food items have been sold.

Utah WIC Program ID Packet

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| V | |
| UTA | H WOMEN, INFANTS & CHILDREN |
| TUIC | ID PACKET MUST BE PRESENTED TO |
| | ECEIVE AND REDEEM WIC CHECKS |
| Endo | rser Name(s): |
| _ | |
| - | |
| | y ID# |
| Partic | cipant Names: |
| 1 | |
| 2 | |
| 3 | |
| 4 | |
| 5 | |
| MATC | IGNATURE ON WIC CHECKS MUST CH ONE OF THE SIGNATURES BELOW: |
| x | Endorser Signature |
| | |
| x | Alternate Endorser Signature |
| | , itemate Endorser eignature |
| x | Draw #4 Cianahura |
| | Proxy #1 Signature |
| | Proxy #2 Signature |
| x | |

The WIC ID Packet (pictured on the previous page) is provided to the participant at the time of certification at their local clinic. The clinic goes through all the steps of verifying identification upon certification; therefore, you do not have to request additional identification from the participant. The endorser name(s) are the names of the people who are authorized to sign the check. The Family ID# is unique to the family holding the packet. Each participant on the program in that family is

listed. These are the names of the people that should be using the food being purchased. Below that are the signature(s) you need to verify against the check

If any ID Packets or checks are left at your store, please return them to the clinic address which is stamped on the back of the WIC ID Packet as soon as possible.

MAKING CORRECTIONS

Correcting the Total Purchase Price

On rare occasions, the cashier may make a mistake and place an inappropriate total amount on the front of the check. The cashier needs only to draw a line through the incorrect amount (do not use white-out), and write in the corrected amount in the "Pay Exactly" box. Do NOT place a "\$" or a "¢" in front or in back of the amount. Make sure the new amount is READABLE. No initials are necessary unless required by store policy.

COUPONS AND DISCOUNTS

Manufacturer's Coupons

 In accordance to the Utah State Tax Commission administrative rule R865-19S-68(D), qualifying WIC purchases are exempt, whether or not a manufacturer's coupon is used and no sales tax is due on the purchase or on the subsequent receipt by the retailer of reimbursement from the manufacturer. The WIC vendor is not permitted to deny the use of in-store or manufacturer's coupons when using WIC checks.

Store Coupons

Utah WIC vendors CAN accept all in-store or store specific coupons.

- Examples include a coupon that offers a few free ounces of a WICeligible food in a larger container for the same price; or the client can get a free item when purchasing one item at regular price. Please note the additional quantity is not counted against the total quantity listed on the check. WIC clients may also benefit from "cents off" coupons for WIC foods and coupons that offer free additional non-WIC items with the purchase of a specific WIC food. In accordance with the WIC redemption policy, the credit from the "cents-off" coupons must be deducted from the total amount on the WIC check and not be given to the WIC participant.
- Program regulations require that WIC vendors treat program participants the same as other customers with respect to both food prices and services. Also, it encourages and reinforces wise food purchasing, a desirable WIC educational goal.

Loyalty Cards

• Grocery loyalty cards can be utilized with WIC transactions as long as the amount of discount is subtracted from the total purchase price and no money is given to the WIC customer.

WIC Food Items on Sale

• If a WIC eligible food item is on sale, the vendor must allow the purchase of that food item at the sale price.

WIC CUSTOMER AND COMPLAINT PROCESS

Reporting WIC Participant Violations

• On occasion, a Utah WIC participant might violate WIC Program requirements such as using foul language, making threats, causing physical abuse, asking the cashier to allow non-WIC approved items to be sold, or attempting to return WIC foods for cash or credit. If the vendor cannot resolve the conflict by just informing the participant of the proper WIC procedures, then the vendor needs to report the incident on a business reply card for participant complaints. Please complete the card with all relevant information. In addition, provide as many details of the incident as possible as this will aid in the discussion with the participant at the clinic. If more reply cards are needed, please contact the State WIC Office. Reply cards are provided at no cost to the retailer.

When to Report a Complaint or Violation

Many vendors do not like reporting WIC participants because they feel they will lose a
customer. However, once the vendor allows the inappropriate behavior, that behavior will
likely continue at other WIC vendors as well. It is recommended that the vendor report the
incident as soon as possible after it happens. When in doubt about how to report or
what to report, the vendor should contact their local agency retail coordinator or the
State WIC Office at 1-877-942-5437.

Resolution of the Complaint/Incident

- A copy of the business reply card with the information you provided is sent to the applicable local WIC agency. The local agency will discuss the alleged violation with the participant.
- Names of those initiating the complaint will not be given to the participant. The only time this
 information is released is during a Fair Hearing.

Discourteous Treatment

Problems with discourteous treatment of a WIC client can occur in several areas. Some of these include:

- Inappropriate verbal communication regarding the correction of a wrong food item being purchased or check transaction;
- Using inappropriate or foul language in front of the WIC participant; and
- Belittling or intimidating the WIC client in public.

In accordance with the Utah WIC Vendor Agreement, the vendor must treat the WIC customer with the same respect and offer WIC participants the same courtesies as offered to other (non-WIC)

customers. If the WIC client has made a mistake, be polite in your explanation of the correct food item or policy. Contact the store manager if that is your store policy, and allow management to handle the problem.

VIOLATIONS

To maintain the integrity of the WIC Program, participants and vendors alike can have penalties assessed against them for violating the policies and procedures related to the WIC Program. Sanctions include warnings, loss of benefits and money penalties for participants; and warnings, civil money penalties, and disqualification from the WIC Program for vendors.

Vendor Violations and Sanctions

State Agency Violation Points and Sanctions

- State Agency violation points can be assigned for
 - each violation which is documented through redemption analysis, a monitoring visit, an inventory audit, or any other objective means;
 - o excessive errors and check rejections; or
 - improper or overcharged WIC checks.
- All State Agency violation points are cumulative and will be kept current for a period of two
 (2) years. Violation points accrued for each violation will be removed two (2) years after the
 date of the violation.
- Excessive violation points may result in vendor disqualification or monetary penalties.
- State Agency Sanctions are based on the number of points accumulated for one or more violations.
- See the Utah WIC Vendor Agreement, or Vendor Training Manual for list of violations and point values

One (1) Year Disqualification from the WIC Program

 A pattern of providing unauthorized food items in exchange for WIC checks, including charging for supplemental foods provided in excess of those listed on the check.

Three (3) Year Disqualification from the WIC Program

- One incidence of the sale of alcohol or tobacco in exchange for WIC checks;
- A pattern of claiming reimbursement for the sale of food which exceeds the store's documented inventory of that food;
- A pattern of vendor overcharges; (intentional or unintentional);
- A pattern of receiving, transacting and/or redeeming WIC checks outside of authorized channels, including the use of an unauthorized vendor and/or an unauthorized person;
- A pattern of charging for supplemental food not received by the participant;
- A pattern of providing credit or non-food items in exchange for WIC checks (no returns or exchanges of WIC foods.)

Six (6) Year Disqualification from the WIC Program

- One incidence of buying or selling checks for cash (trafficking); or
- One incidence of selling firearms, ammunition, explosives, or controlled substances as defined in 21 U.S.C. 802, in exchange for checks.

Permanent Disqualification from the WIC Program

- A vendor convicted of trafficking in checks or selling firearms, ammunition, explosives, or controlled substances (as defined in section 102 of the Controlled Substances Act (21 U.S.C. 802) in exchange for checks.
- A vendor permanently disqualified from the Supplemental Nutrition Assistance Program (SNAP/Food Stamp Program.)

CONFIDENTIALITY

The Utah WIC Program, whether it is the State WIC Office or Local WIC Clinic CANNOT give out WIC participant status or identity to a vendor. The vendor is only allowed to see the WIC ID Packet upon presentation of WIC checks for transaction. Any further requirement by the vendor during transaction is a breach of confidentiality and may be either discourteous treatment or a civil rights violation of the WIC client.

The vendor CANNOT contact the WIC participant to correct a WIC check problem or require payment from the WIC client because a WIC check has been rejected and not paid.

CIVIL RIGHTS

Non-discrimination Clause

In accordance with Federal Law and Department of Agriculture (USDA) policy, this institution is prohibited from discriminating on the basis of race, color, national origin, sex, age, or disability.

To file a complaint of discrimination, write USDA, Director, Office of Adjudication, 1400 Independence Avenue, SW, Washington, D.C. 20250-9410, or call (866) 632-9992 (Voice). Individuals who are hearing impaired or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339; or (800) 845-6136 (Spanish). USDA is an equal opportunity provider and employer.

On these basis no individual will be:

- I. Denied service or other benefits provided under the program.
- II. Subjected to segregation or separate treatment in any matter related to receipt of services under the program.
- III. Restricted in the enjoyment, advantage or privileges received by others within the program.

Examples of discrimination are:

- 1) Requiring the WIC clients to go to one check stand, when other check stands will accept personal checks
- 2) Telling a WIC client, "I wish I could get free food for not working like you"

- 3) Posting a returned WIC food instrument/cash-value check in public or with a "bad check list"
- 4) Referring to WIC clients as "welfare" people
- 5) Announcing over a loud speaker system that a WIC food instrument/cash-value check needs clearance
- 6) Making any unwanted or un-welcomed advances to a WIC client

Discrimination of a WIC client is a serious violation of the Utah WIC Vendor Agreement and may result in State Agency violation points, sanctions, suspension or disqualification.

All Civil Rights complaints are handled by the U.S. Department of Agriculture, not the Utah State WIC Office. If the vendor is found in violation of Federal Civil Rights discrimination, the vendor will be disqualified.



EVALUATION

Completion Instructions

• Training Credit: Completion of this training manual and the evaluation test, can qualify for the **Annual Vendor Training** requirement. In order for your store to receive training credit for this module, the comprehensive **Test Evaluation** must be completed and forwarded to the State WIC Office within thirty (30) days.

It is best to complete the <u>Test Evaluation</u> without looking at the module, but if you are unsure of an answer, please refer back to the module. This is a learning experience!

UTAH WIC PROGRAM VENDOR MANAGEMENT COORDINATOR PO BOX 141013 SALT LAKE CITY, UTAH 84114-1013

The State WIC Office may be contacted by calling in-state toll free at 1-877-942-5437.

UTAH WIC PROGRAM WEBSITE: http://www.health.utah.gov/WIC